

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiff,

v.

Danielle Bertothy,

Defendant.

CRIMINAL NO. 25-021 (GMM)

**THE UNITED STATES OF AMERICA'S
INFORMATIVE MOTION AND MOTION REQUESTING ORDER**

TO THE HONORABLE COURT:

COMES NOW the United States of America by and through the undersigned attorneys and before this Honorable Court very respectfully states and prays as follows:

1. Defendant, Danielle Bertothy, was arrested on January 17, 2025, in Missouri. *See* ECF No. 11-1.
2. On that same date, an initial appearance was held before U.S. Magistrate Noelle C. Collins. *Id.*
3. An order of detention was issued on January 28, 2025 and an order of commitment to the district of Puerto Rico was entered on January 30, 2025. *See* ECF Nos. 11-2 and 11 respectively. Defendant remains in transit to this District.
4. During these proceedings the defendant was represented by Atty. Justin K. Gelfand. His representation was terminated on January 30, 2025. *See* ECF

No. 11-4 at p. 1. Moreover, it is our understanding that Mr. Gelfand is not admitted to practice before this Court.

5. To this date, no attorney has appeared on behalf of the defendant in the charging district, the District of Puerto Rico. Based on the assets reported in the Pretrial Services Report prepared in the Eastern District of Missouri, it is unclear whether Defendant has the means to retain counsel for the matter before this Court.
6. The United States, in compliance with its duties, has discovery pending to be delivered to defendant's attorney of record. Since no attorney has appeared, the matter remains pending.
7. In order for the proceedings to continue and preserve the rights of the defendant, the United States requests that this Court schedule a hearing to address the matter of pending legal representation.
8. Once an attorney enters an appearance for Defendant, we will proceed with the disclosure of Discovery.

WHEREFORE, the United States requests that this Honorable Court take notice of this motion, toll the Speedy Trial Act, and schedule a hearing to address the matter of defendant's legal representation.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on February 14, 2025.

W. Stephen Muldrow
United States Attorney

/S/ Corinne Cordero-Romo
Corinne Cordero-Romo
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

A courtesy copy of this filing will be emailed to Atty. Justin K. Gelfand at justin@margulisgelfand.com.

/S/ Corinne Cordero-Romo
Corinne Cordero-Romo
USDC # 231111
Assistant United States Attorney